

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re )  
KURT A STEINBACH ) Case No. 11-30231-PCM13  
DARLENE R STEINBACH )  
Debtor(s). ) TRUSTEE'S MOTION TO DISMISS  
                        ) FOR FAILURE TO COMPLETE PLAN  
                        ) WITHIN SIXTY (60) MONTHS  
                        )

Wayne Godare, Standing Chapter 13 Trustee ("Trustee"), moves this Court for an order dismissing this case due to the failure of Debtor(s) to complete the plan within the sixty-month limit as required by 11 U.S.C. § 1322(d). The sixtieth plan payment is due in January 2016.

The plan appeared feasible at the time of confirmation. However, Debtor(s) failed to:

- pay to the Trustee all required plan payments
- pay to the Trustee all tax refunds as required by plan ¶1(c)
- provide the Trustee copies of tax returns for tax year(s) \_\_\_\_\_
- pay to the Trustee additional income as required by plan ¶\_\_\_\_
- sell or refinance an interest in real property by February 2015 \_\_\_\_\_

The amount necessary to pay off the case is approximately \$31,000. If there are no further attorney fees, it will take 207 more months to complete the plan at the current plan payment of \$150.

The Trustee requests the Court dismiss this case since the plan will not complete within the maximum sixty-month limit. The Trustee requests the Court set a hearing on this Motion.

Dated: November 17, 2015

*/s/ Wayne Godare*  
Standing Chapter 13 Trustee

I certify that on November 17, 2015, copies of this Motion were served on Debtor(s) via first class mail, at the address listed in the Court records, and on the attorney for Debtor(s) electronically via ECF.

*/s/ Wayne Godare*  
Standing Chapter 13 Trustee